

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE BAYOU HEDGE FUNDS INVESTMENT : No. 06 MDL 1755 (CM)
LITIGATION :
: :
----- X
THIS DOCUMENT RELATES TO: X
: :
BROAD-BUSSEL FAMILY LIMITED : No. 06 Civ. 3026 (CM)
PARTNERSHIP, MARIE-LOUISE :
MICHELSON, MICHELLE MICHELSON, an :
HERBERT BLAINE LAWSON, JR., Individually :
and on Behalf of All Other Persons and Entities :
Similarly Situated, :
: :
Plaintiffs, :
: :
- against - :
: :
BAYOU GROUP LLC, et al., :
: :
Defendants. : ELECTRONICALLY FILED
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**DECLARATION OF LANE L. VINES IN SUPPORT
OF PLAINTIFFS' OPPOSITION TO DEFENDANT
CITIBANK, N.A.'S MOTION TO DISMISS**

Lane L. Vines, declares pursuant to 28 U.S.C. § 1746, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct to the best of my knowledge, information and belief, as follows:

1. I am an attorney duly admitted to practice before this Court. I submit this declaration in opposition to Citibank, N.A.'s motion to dismiss plaintiffs' amended complaint.
 2. Attached as Exhibit A is a true and correct copy of the definition of "money

laundering" from the Citigroup website,

<<www.citi.com/citigroup/citizen/antimoneylaundering/summary.htm>>.

3. Attached as Exhibit B is a true and correct copy of the Wolfsberg Global Anti-Money-Laundering Guidelines for Private Banking (AML Principles).

4. Attached as Exhibit C is a true and correct copy of the Wolfsberg Statement on Screening and Searching.

5. Attached as Exhibit D is a true and correct copy of the Suspicious Activity Report (SAR), as per the Financial Crimes Enforcement Network of the United States Department of the Treasury.

Dated: June 30, 2006



Lane L. Vines